



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Eleanor M. Lackman
Partner
(212) 878-4890 Phone
(917) 546-7675 Fax
eml@msk.com

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VIA ECF

The Honorable James L. Cott
United States Magistrate Judge, S.D.N.Y.
500 Pearl Street, Room 1360
United States Court House
New York, NY 10007

Re: Tom Hussey Photography, LLC v. BDG Media, Inc. 21-cv-03514 (AT) (JLC)

Dear Judge Cott:

On behalf of defendant BDG Media, Inc., we write to request leave to file a letter response under seal. The basis for such request is that the letter asks for sealing of a document, filed publicly, that should not have been filed on the public docket due to its disclosure of a term of a confidential agreement. Such letter necessarily references the confidential term at issue, and therefore should be sealed as well.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', with a stylized flourish extending to the right.

Eleanor M. Lackman
Partner of
MITCHELL SILBERBERG & KNUPP LLP

EML